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MHP

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA and  
CHUNG NGO, Revenue Agent,

Petitioners,

v.

RICHARD IVALDI,

Respondent.

CV 10 1277  
NO.  
[Proposed]  
ORDER TO SHOW CAUSE RE  
ENFORCEMENT OF INTERNAL  
REVENUE SERVICE SUMMONS

Good cause having been shown by the petitioners upon its petition filed in the above-entitled proceeding on March 26, 2010, it is hereby:

**ORDERED** that respondent Richard Ivaldi appear before this Court on the 10th day of May, 2010, at 2:00pm., in Courtroom No. 15, 18th Floor, United States District Court, 450 Golden Gate Avenue, San Francisco, California, and then and there show cause, if any, why respondent should not be compelled to appear and provide documents and testimony as required by the summons heretofore served upon respondent as alleged and set forth in particular in said petition; and it is further

**ORDERED** that a copy of this Order to Show Cause, together with a copy of the aforesaid petition, be served upon said respondent in accordance with Rule 4 of the Federal Rules of Civil Procedure at least thirty-five (35) days before the return date of

1 this Order above specified; and it is further

2 **ORDERED** that within twenty-one (21) days before the return date of this Order,  
3 respondent may file and serve a written response to the petition, supported by appropriate  
4 affidavit(s) or declaration(s) in conformance with 28 U.S.C. § 1746, as well as any  
5 motion respondent desires to make, that the petitioner may file and serve a written reply  
6 to such response, if any, within fourteen (14) days before the return date of this Order;  
7 that all motions and issues raised by the pleadings will be considered on the return date of  
8 this Order, and only those issues raised by motion or brought into controversy by the  
9 responsive pleadings and supported by affidavit(s) or declaration(s) will be considered at  
10 the return of this Order, and any uncontested allegation in the petition will be considered  
11 admitted.

12 **ORDERED** this 30th day of March, 2010, at San Francisco,  
13 California.

